

**SCANNED**

**FILED**

AUG 27 2019

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	Criminal No. 17-246
	)	
v.	)	(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii),
	)	848(b) and 846; 18 U.S.C. §§ 1956(h) and
RACOCO WILLIAMS	)	1952(a)(3))

**SUPERSEDING INDICTMENT**

**COUNT ONE**

The grand jury charges:

On or about April 13, 2017, in the Western District of Pennsylvania, the defendant, RACOCO WILLIAMS, did knowingly, intentionally and unlawfully possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

**COUNT TWO**

The grand jury further charges:

On or about August 29, 2017, in the Western District of Pennsylvania, the defendant, RACOCO WILLIAMS, did knowingly, intentionally and unlawfully possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

### **COUNT THREE**

The grand jury further charges:

From in and around 2012, and continuing thereafter to in and around March 2018, in the Western District of Pennsylvania and elsewhere, the defendant, RACOCO WILLIAMS, did knowingly, intentionally and unlawfully conspire with persons both known and unknown to the grand jury, to distribute and possess with intent to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii); and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

In violation of Title 21, United States Code, Section 846.

#### **COUNT FOUR**

The grand jury charges:

From in and around 2012, and continuing thereafter to in and around March 2018, in the Western District of Pennsylvania and elsewhere, the defendant, RACOCO WILLIAMS, did unlawfully, knowingly and intentionally engage in a continuing criminal enterprise in that the defendant, RACOCO WILLIAMS, unlawfully, knowingly and intentionally violated Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii) and 846 as alleged in Counts One, Two and Three of this Superseding Indictment, each of which are realleged and incorporated herein by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, et seq., undertaken by the defendant, RACOCO WILLIAMS, in concert with at least five other persons with respect to whom the defendant, RACOCO WILLIAMS, occupied a position of organizer, supervisor, and any position of management, from which such continuing series of violations the defendant, RACOCO WILLIAMS, obtained substantial income and resources.

Furthermore, the defendant, RACOCO WILLIAMS, was a principal administrator, organizer, supervisor and leader of the criminal enterprise, which involved possession with intent to distribute and distribution of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and the amount of a mixture and substance containing a detectable amount of cocaine involved was 150 kilograms or more.

In violation of Title 21, United States Code, Section 848(b).

### **COUNT FIVE**

The grand jury further charges:

From in and around 2012, and continuing thereafter to in and around August 2017, in the Western District of Pennsylvania and elsewhere, the defendant, RACOCO WILLIAMS, did knowingly, intentionally, and unlawfully conspire with persons both known and unknown to the grand jury to conduct and attempt to conduct financial transactions affecting interstate commerce involving the proceeds of a specified unlawful activity, that is, illegal drug trafficking in violation of 21 U.S.C. §§ 841 and 846, with the intent to promote the carrying on of the specified unlawful activity and knowing that the transactions were designed, in whole or in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to the provisions of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

## **COUNT SIX**

The grand jury further charges:

From in and around 2012 through in and around August 2017, in the Western District of Pennsylvania and elsewhere, the defendant, RACOCO WILLIAMS, traveled in interstate commerce, with intent to promote, manage, establish, carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, (1) a business enterprise involving narcotics and controlled substances (as defined in Section 102(6) of the Controlled Substances Act) in violation of 21 U.S.C. §§ 841 and 846; and (2) an act which is indictable under 18 U.S.C. § 1956; and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of the unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

## **FORFEITURE ALLEGATIONS**

1. The allegations contained in Counts One through Six of this Superseding Indictment are incorporated by reference as if fully set forth herein for the purpose of alleging criminal forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1); Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p); and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant, RACOCO WILLIAMS, charged in Counts through Four, that, upon his conviction of any such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, including but not limited to, the following:

### **Money Judgment**

A sum of money equal to at least approximately \$10,000,000.

### **Specific Property**

\$78,500 seized on or about April 13, 2017 from the search of 309 8th Street, Carnegie, Pennsylvania;

\$89,956 seized on or about May 11, 2017 from the search of a vehicle operated by the defendant, RACOCO WILLIAMS;

\$37,750 seized on or about May 11, 2017 from Room 416 of the Courtyard Marriot Hotel located in Monroeville, Pennsylvania;

Assorted jewelry further seized on May 11, 2017 further described as: a Gent's 18 karat yellow gold Rolex Day Date with Blue Face and diamonds, a Gent's Cartier Watch stainless

steel tank with diamonds, a Ladies gold plated triple heart bracelet, a Gent's 14 karat yellow gold Rolex style ring containing 25 princess cut diamonds, a 10 karat yellow gold "Angel" pendant containing 117 round faceted diamonds, a 14 karat white gold "invisible set" diamond ring containing 63 princess cut diamonds, and a pair of 10 karat yellow gold "Button" style bead set earrings.

\$192,854 seized on or about August 29, 2017 from Room 219 of the Extended Stay America located at 3851 Northern Pike, Monroeville, Pennsylvania and the person of the defendant, RACOCO WILLIAMS;

Assorted jewelry further seized on August 29, 2017 further described as: a stainless steel and 14 karat yellow gold Rolex wrist watch with approximately 900 diamonds; 14 Karat yellow gold 30 inch chain set with approximately 308 diamonds; 10 karat yellow gold 24 inch chain; 14 karat yellow gold pendant with approximately 308 diamonds; and a 14 karat gold ring with approximately 200 diamonds.

BMW X5, with Arizona license plate number BKN5866.

(collectively SUBJECT PROPERTIES AND ASSETS).

3. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as charged in Count Five of this Indictment, the defendant, RACOCO WILLIAMS, shall forfeit to the United States any property, real or personal, involved in this offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the SUBJECT PROPERTIES AND ASSETS.

4. The United States hereby gives notice to the defendant, RACOCO WILLIAMS, charged in Count Six that, upon his conviction of such offense, the government will



seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense, including but not limited to the SUBJECT PROPERTIES AND ASSETS.

5. If, through any act or omission by the defendants, any or all of the property and proceeds referenced in paragraphs two, three and four above (hereinafter "SUBJECT PROPERTIES AND ASSETS"):

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be

subdivided without difficulty,

the United States intends to seek forfeiture of any other property, proceeds, or funds of the defendants up to the value of the SUBJECT PROPERTIES AND ASSETS referenced above pursuant to Title 18, United States Code, Section 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).

A True Bill,



Foreperson



SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352